



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**JUN 09 2010**

Ref: 8EP-N

Ms. Maria T. Garcia  
Acting Forest Supervisor  
Dixie National Forest  
1789 N. Wedgewood Lane  
Cedar City, UT 84721-7769

RE: Kitty Hawk Administrative Site Master  
Development Plan DEIS: CEQ# 20100142

Dear Ms. Garcia:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Kitty Hawk Administrative Site Master Development Plan Draft Environmental Impact Statement (DEIS). This 4.5 acre interagency administrative site is located in Cedar City, Utah. It is owned by the U.S. Department of Agriculture-Forest Service (FS) and used by the Dixie National Forest, the U.S. Department of Interior-Bureau of Land Management (BLM) Cedar City District Office and the National Park Service (NPS).

The proposed expansion of this site would meet the recently identified administrative needs identified in the long-range plan for development of the site. The site Master Plan for development includes:

- Accommodation of the new maintenance shop, parking space for vehicles held while being processed for sale and vehicles awaiting maintenance by the Forest.
- Accommodation of parking of heavy equipment and storage of road materials used by Forest crews.
- Provision of sufficient space for the Color Country Interagency Fire Center, including Dispatch, classroom training facilities, physical training facilities, meeting rooms, offices and fire-related supplies.
- Provision of secure storage for high investment equipment, such as fire engines and Alternate Travel Vehicles.
- Provision of compliant storage of hazardous materials and fuels trailers.
- Provision of secure and organized storage and other planned uses for Forest staffs,

such as wildlife, watershed, recreation, timber, and range staffs of the Cedar City District and Supervisor's office.

- Provision of safe parking for personal vehicles and fleet vehicles while personnel work at the site, use facilities or equipment at the site, or transfer to other vehicles for off-site work. This includes much of the large seasonal workforce, including fire crews.
- Accommodation of the proposed needs of the BLM and NPS.

EPA has reviewed this DEIS and focuses on a few recommendations for commitments on mitigation for prairie dog impacts and inclusion of information for Executive Order (E.O.) 13514.

### ***Prairie Dog Impacts***

The primary environmental concern identified for this project is the effect of site development on the Utah prairie dog, a threatened species under the Endangered Species Act (ESA), and sensitive animal species. Direct effects will occur due to the conversion of 1.28 acres of suitable prairie dog habitat within the greater 9.25 acres proposed for development. Site development will result in the elimination of the existing colony of 51 burrows and at least 5 adult prairie dogs and is considered a take situation under the ESA. The Forest has initiated consultation with the U.S. Fish and Wildlife Service (FWS) under Section 7 of the ESA. The DEIS states that the Forest will incorporate terms and conditions from the FWS biological opinion for the selected alternative.

***Recommendation:*** EPA recommends that the FWS mitigation measures be included in the Final EIS/Record of Decision for this project.

A Biological Evaluation of Sensitive Animal Species for the Kitty Hawk Administrative Site Master Development Plan Cedar City Ranger District Dixie National Forest was completed by the Forest on April 8, 2010 and renders a "No Impact" determination on the Intermountain Region Sensitive Animal Species. Management recommendations include contacting the Forest Wildlife Biologist when animal observations are made during project activities in order to allow for mitigation measures to be implemented.

***Recommendation:*** EPA recommends that the Forest specify a protocol for triggering notification requirements for mitigation when animals are identified that can be utilized by contractors during site development. This, along with the specific terms and conditions specified by FWS, should become incorporated into Site Management Practices. Episodic inspections by the Forest's Wildlife Biologist are strongly suggested in order to assure compliance.

### ***Executive Order (E.O.) 13514***

E.O. 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, was not addressed in this DEIS. The goal of E.O. 13514 is "to establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions (GHG) a priority for Federal agencies."

The E.O. addresses sustainable building practices and steps that federal agencies should take to ensure all new construction, major renovations, or repair or alteration of Federal buildings



comply with the Guiding Principles of Federal Leadership in High Performance and Sustainable Buildings. In addition, E.O 13514 requires federal agencies to pursue cost-effective, innovative strategies (e.g., highly-reflective and vegetated roofs) to minimize consumption of energy, water, and materials.

**Recommendations:** *EPA recommends that the Forest address E.O. 13514 regarding energy efficiency measures and recycling practices for the new and old building at the site. More information regarding energy efficiency measures for new buildings, recycling of materials on old buildings, and commitments to implementation of this executive order should be incorporated into the Final EIS. Instructions for implementing this executive order can be found at <https://www.1.eere.gov/femp/regulations/eo13514>.*

**EPA Rating:**

Based on EPA's review, and in accordance with our policies and procedures for reviews under NEPA and Section 309 of the Clean Air Act, EPA has rated the alternatives analyzed in this DEIS as L.O. (Lack of Environmental Concerns). The DEIS would require only minor changes to address our recommendations. An explanation of the rating criteria is enclosed.

We appreciate the opportunity to comment on the DEIS and look forward to working with you to resolve the issues raised in our detailed comments. If you have any questions on our comments, please contact me at 303 312-6004 or Robin Coursen, at 303 312-6695.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Svoboda', with a stylized flourish extending to the right.

Larry Svoboda, Director  
NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Betsy Herrmann, FWS email